

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:

LeClairRyan PLLC,

Debtor¹

Case No.: 19-34574-KRH

Chapter 7

SUPPLEMENTAL VERIFIED STATEMENT OF ERIKA L. MORABITO

Pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure, I, Erika L. Morabito, make the following “**Supplemental Verified Statement:**”

1. I am a partner at Quinn Emanuel Urquhart & Sullivan, LLP (“**Quinn Emanuel**”) and am admitted to practice law in, among other jurisdictions, the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia. I personally know the facts set forth in this Supplemental Verified Statement and, if called as a witness, I would testify thereto.

2. I make this Supplemental Verified Statement in further support of the *Trustee’s Application to Retain and Employ Quinn Emanuel Urquhart & Sullivan, LLP as Special Counsel* [ECF No. 908] (the “**Quinn Retention Application**”). Attached to the Quinn Retention Application was the Verified Statement of Erika L. Morabito of Quinn Emanuel pursuant to Fed. R. Bankr. P. 2014(a) (the “**Morabito Statement**”). On June 28, 2021, the Court entered its *Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Special*

¹ The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

Erika L. Morabito (VA Bar No. 44369)
Brittany J. Nelson (VA Bar No. 81734)
QUINN EMANUEL URQUHART & SULLIVAN, LLP
1300 I Street, NW, Suite 900
Washington, DC 20005
Telephone: (202) 538-8000

Special Counsel to the Chapter 7 Trustee

Counsel [ECF No. 937] (the “**Quinn Retention Order**”), retroactive to May 18, 2021. Further, on August 2, 2022, the Trustee filed the *Trustee’s Supplement to Application to Retain and Employ Quinn Emanuel Urquhart & Sullivan, LLP as Special Counsel* [ECF No. 1533] (the “**Supplemental Application**”).

3. On August 2, 2022, the Trustee² filed the *Trustee’s Application to Retain and Employ Cozen O’Connor as Special Counsel* [ECF No. 133] (“**Cozen Application**”), which seeks to employ Cozen O’Connor as to assist the Estate in the Judicially Mediated Global Settlement Appeal (as defined in the Cozen Application). In the Supplemental Application, the Trustee also sought to retain Quinn Emanuel to assist with certain aspects of the Judicially Mediated Global Settlement Appeal. *See* Supplemental Application at ¶ 23.

4. In further support of the Application and the Supplemental Application, I submit this Supplemental Verified Statement to provide additional disclosures in accordance with Bankruptcy Rule 2014(a).

5. Quinn Emanuel does not represent or hold any interest adverse to the Debtor or the Estate with respect to the matter on which it is engaged (or seeks to become engaged) and is a “disinterested person” as that term is defined in Section 101(14) of the Bankruptcy Code. In light of the pending Cozen Application, and in addition to the information contained in the Morabito Statement, Quinn Emanuel also discloses the following information:

- a. Cozen O’Connor has or currently represents Quinn Emanuel in matters unrelated to the Case.

² All capitalized terms not defined herein have the meaning ascribed to them in the Quinn Application.

7. If any additional material relationships are discovered or arise as the Case progresses that warrant further disclosure, Quinn Emanuel will disclose them in a supplemental filing pursuant to Bankruptcy Rule 2014(a).

I, Erika L. Morabito, one of the partners of Quinn Emanuel Urquhart & Sullivan, LLP, declare under penalty of perjury that the foregoing is true and correct.

/s/ Erika L. Morabito
Erika L. Morabito

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2022 a copy of the foregoing was filed and served via the Court's Electronic Case Filing System on all parties receiving such notification.

/s/ Erika L. Morabito

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Brittany J. Nelson (VA Bar No. 81734)
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Washington, DC 20005
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